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February 8, 2007

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 06-172: Verizon's Petitions for Forbearance Pursuant to 47 U.S.C. §160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence, and Virginia Beach Metropolitan Statistical Areas; RM-11358: Petitions for Rulemaking and Clarification Regarding the Commission's Rules Applicable to Retirement of Copper Loops and Copper Subloops**

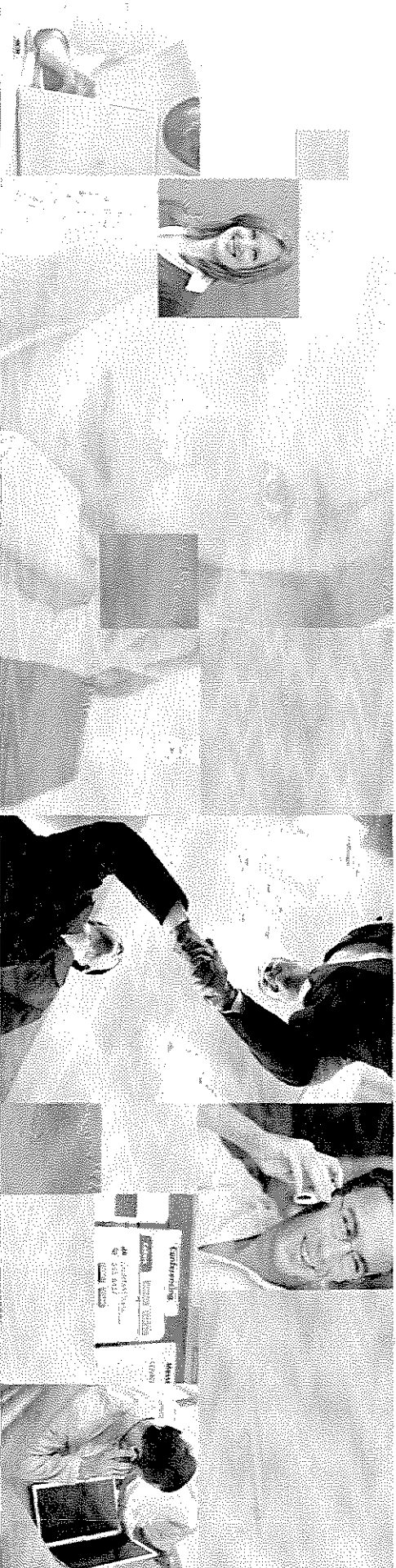
Dear Ms. Dortch:

On February 7, 2007, Jim Kirkland, Chris McKee and I, all of Covad Communications, met with Renee Crittendon, Chief of the Competition Policy Division of the Wireline Competition Bureau, and Adam Kirschenbaum, also of the Wireline Competition Bureau, to discuss Covad's business generally and the status of the above-referenced proceedings. A copy of materials discussed in the meeting is attached.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), an electronic copy of this notice is being filed in each of the above-referenced proceedings.

Respectfully submitted,

Angela Simpson  
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TRANSFORMING COMMUNICATIONS THROUGH BROADBAND INNOVATION

## **Covad Communications Group Inc.**

February 2007

Ticker: DVW

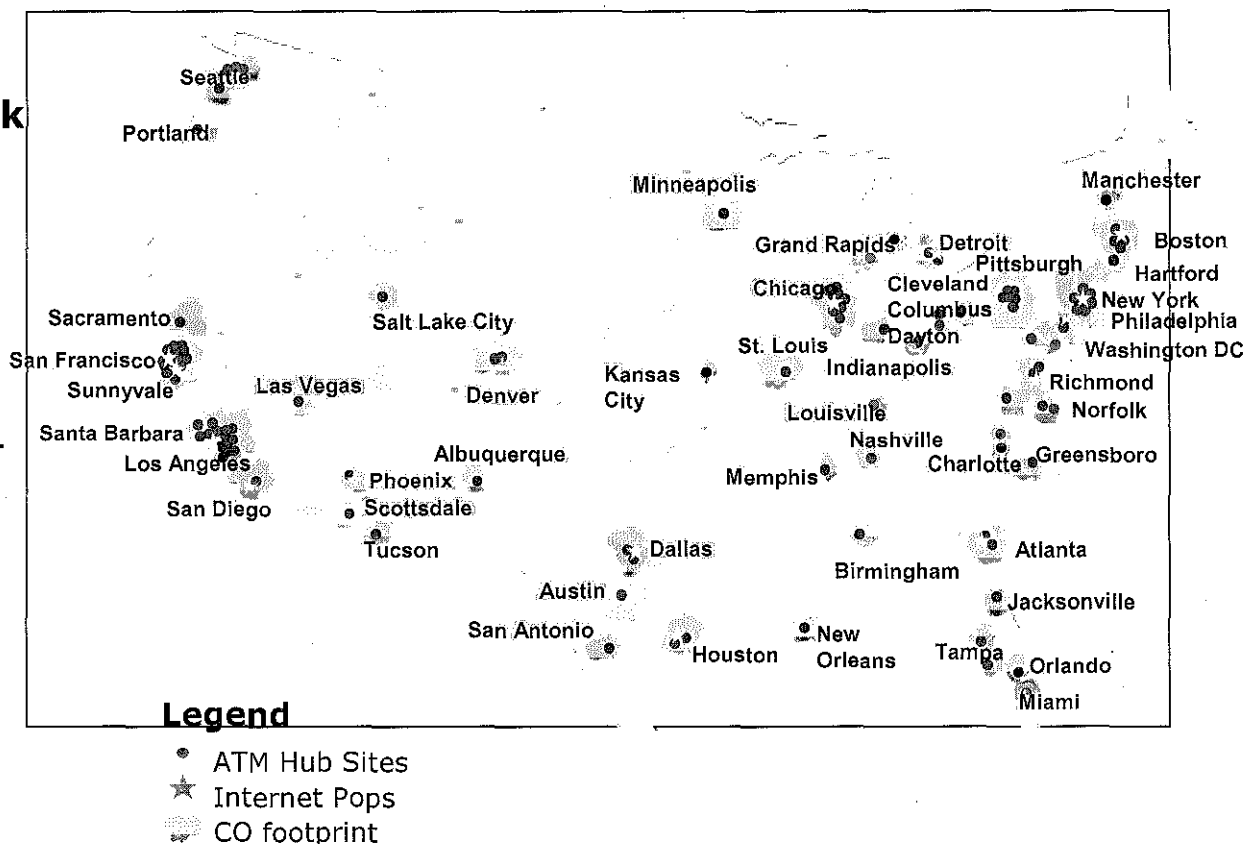
**COVAD®**

Covad is a national, facilities-based provider of voice and broadband services

- **Founded in 1996, recently celebrated 10<sup>th</sup> anniversary, ~1,000 employees**
- **As a leading next-generation communications service provider, we are transforming communications through broadband innovation**
  - Largest national ADSL2+ network (allowing residential broadband speeds of up to 25 Mbps) with capabilities to deliver next generation broadband and voice services to over 14 million homes and businesses
  - Market leader with our direct Hosted VoIP (fully outsourced and managed) services to the Small to Mid-sized Business market
  - Leading fixed wireless broadband provider (speeds from 1-100 Mbps) for businesses, uniquely positioned to capitalize on the emergence of WiMAX
  - Wholesale partnerships enable innovative and competitive broadband and voice services to residential market – our customers include EarthLink, AT&T, and Verizon Business
- **Making an excellent customer experience our #1 priority**
  - 532,000 Access Lines
  - 2,500 VoIP Sites (47,000 users)
  - 3,100 Wireless Customers

Largest National, Facilities-based, Next-Generation Communications Service Provider

- **2,050 COs in 235 MSAs**
- **Next-generation network**
  - 758 COs in top 11 markets\*
  - Capable of serving ~14M+ homes and businesses
  - LPVA, Bonded T1, ADSL 2+, MetroEthernet, Video, G.SHDSL capabilities
- **100+ wireless base stations passing 500k+ businesses**
  - SF Bay Area, Los Angeles, Las Vegas, Chicago



\* Next generation markets include: Atlanta, Chicago, Dallas, Los Angeles, Miami, New York City, Philadelphia, San Diego, San Francisco/San Jose, Seattle, Washington, DC



## **Regulatory Stability Means Competition, Lower Prices, and Better Services for Consumers and Businesses**

- **Competitive carriers have enjoyed nearly two years of regulatory stability** and have responded by investing billions of dollars in new facilities and services
- **Recent AT&T/BellSouth merger conditions ensure stable regulatory environment** through the end of the decade
  - Rate freeze for telco network elements used by competitive carriers until 2010
  - No forbearance petitions with the FCC during this time
  - In short, the largest incumbent phone company has agreed that no further tinkering with pro-competitive network access requirements is needed
- **FCC has already deregulated new broadband facilities of telcos**
  - Telcos now have full parity with cable company broadband services
- **Further fine tuning of telecom regulation will only bring back uncertainty, new waves of litigation and stalled investment**
- With deregulation of investment in new facilities, **the only remaining regulations are minimal, pro-competitive network access requirements that allow carriers like Covad to utilize legacy copper loops** that telcos built out many years ago
- **Covad connects these legacy loops to its state of the art network** to provide innovative new data, voice, and other services to businesses and consumers
  - Verizon Forbearance Petition would remove this important source of competition with no corresponding benefit



## Covad Uses Legacy Copper to Provide Innovative New Services – Voice/VOIP/ADSL 2+ Bundle

